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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To:
All Direct Purchaser Actions

Master Docket No. 3:07-cv-05944-SC
MDL No. 1917

**DECLARATION OF DEBORAH E.
ARBABI IN SUPPORT OF OPT-IN
PLAINTIFFS' MOTION TO
WITHDRAW REQUESTS FOR
EXCLUSION FROM THE
SETTLEMENT CLASSES AND TO
JOIN THE CLASS SETTLEMENTS**

DECLARATION OF DEBORAH E. ARBABI

I, Deborah E. Arbabi, declare as follows:

1. I am an attorney at the law firm of Crowell & Moring LLP and one of the attorneys of record for Old Comp Inc., RadioShack Corporation, and ViewSonic Corporation (together with Unisys Corporation, "Opt-In Plaintiffs"). I have personal knowledge of the facts set forth herein, and, if called to testify as a witness, could and would do so under oath.

2. On November 20, 2013, I met and conferred with James McGinnis, counsel for Defendants Samsung Electronics Company, Ltd., Samsung Electronics America Inc., and Samsung Semiconductor, Inc. ("Samsung") and liaison counsel for the Defendants, regarding Opt-In Plaintiffs' intent to file a Motion to Withdraw Requests for Exclusion from the Settlement Classes and to Join the Class Settlements ("Motion"). Mr. McGinnis indicated to me that he would discuss the Motion with the Defendants in question, namely: (1) Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. (collectively, "CPT") and Koninklijke Philips Electronics N.V., Philips Electronics North America Corporation, Philips Electronics Industries (Taiwan), Ltd., and Philips Da Amazonia Industria Electronica Ltda. (collectively, "Philips"); (2) Panasonic Corporation (f/k/a Matsushita Electric Industrial Co., Ltd.), Panasonic Corporation of North America, and MT Picture Display Co., Ltd. (collectively, "Panasonic"); (3) LG Electronics, Inc., LG Electronics USA, Inc., and LG Electronics Taiwan Taipei Co., Ltd. (collectively, "LG"); (4) Toshiba Corporation, Toshiba America Information Systems, Inc., Toshiba America Consumer Products, L.L.C., and Toshiba America Electronic Components, Inc. (collectively, "Toshiba"); and (5) Chunghwa Picture Tubes Ltd. ("Chunghwa") (together, the "Settling Defendants").

3. On December 12, 2013, Mr. McGinnis advised that he had discussed the substance of the Opt-In Plaintiffs' request and confirmed that the Settling Defendants had no objection to the Motion.

4. On January 22, 2013, I met and conferred with Rick Saveri, direct class counsel, regarding the Motion. Mr. Saveri noted that Direct Purchaser Plaintiffs would likely object to the Motion.

5. Finally, on January 22, 2013, I contacted Lauren Russell, indirect class counsel, regarding the Motion. I followed up with Ms. Russell and Mario Alioto, indirect class counsel, on January 28, 2014. As of this date, Indirect Purchaser Plaintiffs have not advised whether they object to the Motion.

6. Attached hereto as Exhibit A are true and correct copies of letters submitted by the Opt-In Plaintiffs requesting exclusion from the various settlement classes.

7. Attached hereto as Exhibit B are true and correct copies of letters submitted by Old Comp. Inc. and RadioShack Corporation withdrawing their requests for exclusion from the Chunghwa indirect purchaser settlement class.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of February, 2014 at Irvine, California.

/s/ Deborah E. Arbabi
Deborah E. Arbabi